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DOCKET FILE 92-237

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April 9, 1998

APR - 9 1998

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Ex parte CC Docket No. 92-237 (CIC Conversion)

Dear Ms. Salas:

In connection with BellSouth's Request for a Ruling on the blocking of the 5-digit CACs, GTE offers this information for the record.

It is literally not possible to make a flash cut to blocking in a single night. GTE has more than 1600 switches which will need database updates with 5 different manufacturers represented in our inventory. The database changes in some switches could take as little as two hours each, while others will need as much as eight hours, depending on the type of switch and the amount of database updating necessary. The total time required will be more than 7600 hours of personal activity over a period of between two to three months. The process requires a database management (DBM) analyst to work with the customer zone technician in the field to make the test calls. In some cases, DBM writes the database updates and sends them to the field on a diskette (or paper) for the field to implement and test on site. The database updates can not be performed automatically. To minimize impact on customer calling, such database updates and testing typically take place only between midnight and 6:00 AM.

The database update process requires entering translations in tables for each carrier and rerouting of any 10XXX dialing from the carrier's trunk group to the new required standard intercept message. The DBM analysts are a cadre of experts who have routine database activity and other projects (such as LNP and unbundling) which require time simultaneously with the 10XXX blocking effort. Consequently it is essential that a transition period be allowed to permit completion of the 10XXX blocking.

A question has been raised as to the practicality of pre-programming switches to permit a flash cut. This may be technically feasible but only if there is a feature in the switch which would permit it. While our 5-ESS switches (150) may have this capability, the switches from our other vendors do not. We have, for example, more than 700 Nortel switches. To add a pre-programming feature to perform blocking of 10XXX on a flash cut basis in these switches will require us to request it from Nortel. This typically has a 60-90 day turnaround for a response, and a long period of time for Nortel to write the program and for us to install and test it in all of the Nortel switches. The net result could be up to a year before we would have the ability to pre-program a flash cut, not to mention the cost of adding this feature. We are not aware of a requirement to have added this pre-programming feature in our switches.

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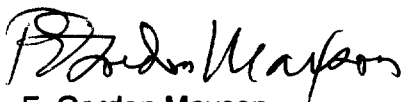
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The amount of time required to add the pre-programming feature in order to allow a flash cut to blocking at this point simply prolongs the period of time for permissive dialing and will cause customers to become used to the fact that the 10XXX codes continue to work. As we have noted before, the key at this point seems to be the need for customer education and a definite end to the permissive dialing period. The fact that some calls might be completed after July 1, 1998 using 10XXX for a short period of time should be no problem if callers know the facts.

We would like the opportunity to visit at your earliest convenience with other industry parties to discuss this matter. Please call me at 463-5291 if I may provide anything further.

Two copies of this notice are filed in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Very truly yours,



F. Gordon Maxson
Director - Regulatory Affairs

Attachment

C: Geri Matise
Kris Monteith
Renee Alexander
ITS